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February 5, 2020

**Via ECF**

The Honorable Jesse M. Furman  
United States District Court  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**RE:** *United States v. Tokhtakhounov, et al.*, No. 13-CR-0268 (JMF)

Dear Judge Furman:

I represent defendant Vadim Trincher in the above-captioned matter. Mr. Trincher adopts and joins in defendant Noah Siegel's opposition to the letter seeking relief from the Protective Order entered by this Court and all arguments made therein. *See generally* Dkt. 1369 and 1373. Mr. Trincher objects to the unsealing of any Title III related discovery, including any applications, orders, line sheets, or recordings, and asserts his privacy interests in any intercepted communications that include him or any applications, orders, or other unadjudicated Title III materials that relate to him. *See* 18 U.S.C. § 2518. Mr. Trincher reserves the right to supplement this response and to respond to any request by the Court for further briefing.

Yours Truly,

**/s/ Martin G. Weinberg**  
Martin G. Weinberg  
*Admitted pro hac vice*